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 TRADER JOE'S UNITED

**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

TRADER JOE'S COMPANY, a California
 corporation,

Plaintiff,

vs.

TRADER JOE'S UNITED,

Defendant.

Case No. 2:23-cv-05664-HDV-MAR

**DEFENDANT TRADER JOE'S
 UNITED'S APPLICATION TO
 APPEAR REMOTELY**

Filed Concurrently with Declaration of
 Retu Singla and [Proposed] Order

Hon. Hernán D. Vera
 Date: November 9, 2023
 Ctrm: 5B
 Time: 10:00 a.m.

Complaint Filed: July 13, 2023

APPLICATION TO APPEAR REMOTELY

Defendant Trader Joe's United respectfully requests that this Court allow its lead counsel Retu Singla to appear remotely for the hearing on Defendant's Motion to Dismiss scheduled for November 9, 2023, at 10 a.m. in Los Angeles.

There is good cause for a remote appearance. Defendant's Lead Attorney Singla has led this case from the inception and is most equipped to argue Defendant's motion. (Declaration of Retu Singla, ¶ 1.) Indeed, she will argue the motion. (Id.) However, Attorney Singla resides in New York, and it would be a long and expensive trip to fly to Los Angeles. (Id., ¶ 2.) It would significantly impact Trader Joe's United, a fledgling union with extremely modest funds, to have to pay for the flight for Attorney Singla to appear. (Id., ¶ 2, 6.) TJU needs its meager funds to maintain its union against Plaintiff's documented unfair labor practices against it. (Id., ¶¶ 4-5.)

In addition, by eliminating the need for travel, Attorney Singla will have more time to engage in her frequently pro bono work for working people and newly organizing workers. (Id., ¶ 7.)

Dated: November 2, 2023

SIEGEL, YEE, BRUNNER & MEHTA

By: /s/ Sonya Z. Mehta
Sonya Z. Mehta

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